REMARKS

Claims 1-44 are pending. By this amendment, claims 4, 16, 31 and 36 are amended and claims 38-46 are added to provide more comprehensive protection for certain aspects of the invention. Reconsideration in view of the following comments is respectfully requested.

Applicants would like to thank Examiners Bella and Nguyen for the courtesies extended to Applicants' personal representative, Mr. Jason Vick, during the December 3rd Personal Interview. At the interview, all claims were discussed and contrasted with the Conboy et al. reference. Furthermore, and in general, the background and the operation of the invention were discussed, as well as the definition of the term "component." Still further it was pointed out that the relied upon references fail to teach each and every feature of the claims. In summary, it was recommended by the Examiner that the language of the claims be clarified to overcome the art of record.

The Office Action rejects claim 4 under 35 U.S.C §112. Applicants have amended claim 4 and respectfully submit the claim is in compliance with 35 U.S.C §112 and request withdrawal of the rejection under 35 U.S.C. § 112.

The Office Action rejects claims 1-8, 10, 12-18, 20, 22-34 and 36 under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,363,418 to Conboy et al. this rejection is respectfully traversed.

Claim 1 recites, *inter alia*, locating at least one component that is related to an uncached object and constructing, by the cache, the uncached object from the located at least one component. As recited on page 10 of the Specification:

> The object payload 58 is comprised of one or more components
> 60a through 60n (generally 60). Each component 60 is
> comprised of a component tag 62 and a component payload 64.
> The component tag 62 provides information such as a
> component identifier, a component type, and details relating to
> the component contents. The component payload 64 contains
> additional information related to the component 60.

Conboy is directed to an on-line image caching control for efficient image control

display. In particular, Conboy discloses a method for on-line controlling caching of an image on a viewing device to efficiently display the image on the viewing device. The method comprises the following steps: (a) sending from a server to the viewing device an image tag included in a hypertext language code, the image tag having attributes, the attributes specifying the image; (b) parsing the hypertext language code including the image tag; (c) searching for a copy of the image in a cache memory of the viewing device using the image tag attributes; (d) displaying the copy of the image if the copy of the image is found in the cache memory and is current; (e) fetching the image from the server if the copy of the image is not found in the cache memory or if the copy of the image is not current; and (f) storing the fetched image and the image tag attributes in the cache memory.

However, Applicants can find no teaching in Conboy that can be equated to the constructing step as claimed. Furthermore, and based on Applicants definition of "component" recited above, and the well established doctrine that the claims must be given their broadest reasonable meaning *consistent with the specification*, there is no suggestion or disclosure in Conboy of a component having a component tag and a component payload as claimed. Comparable arguments can be made for claims 16, 31 and 36.

Furthermore, Conboy recites on column 4, lines 57-62 that "After the image is fetched, it is stored in the cache memory 406... The fetched and stored image is then displayed (Block 216)." Accordingly, and as further evidenced by Fig. 2 of Conboy, there is no disclosure or suggestion in Conboy of constructing, by the cache, the uncached object as claimed.

Accordingly, the rejection under 35 U.S.C. §102(e) is untenable and should be withdrawn.

The Office Action rejects claims 9, 11, 19, 21, 35 and 37 under 35 U.S.C. § 103(a) as unpatentable over Conboy in view of Ching-Yung Lin ("Introduction of JPEG2000"), hereinafter "Lin." This rejection is respectfully traversed.

Applicants respectfully submit that Lin fails to overcome the deficiencies as noted above in relation to Conboy. Accordingly, since the cited references, either alone or in combination, fail to suggest or disclose each and every feature of the rejected claims, claims 9, 11, 19, 21, 35 and 37 are neither anticipated nor rendered obvious by the references of record. Withdrawal of the rejection under 35 U.S.C. § 103 is respectfully requested.

Applicants respectfully submit the application is in condition for allowance. Favorable reconsideration and prompt allowance are respectfully requested.

Should the Examiner believe anything further is desirable in order to place the application in even better condition for allowance, the Examiner is encouraged to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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